

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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ENRIQUE JEVONS, individually and on	:
behalf of all others similarly situated,	:
	:
Plaintiff,	:
	:
v.	:
	:
BOSTON SCIENTIFIC CORPORATION,	:
MICHAEL F. MAHONEY, and DANIEL J.	:
BRENNAN,	:
	:
Defendants.	:
-----	X

**STIPULATION AND [PROPOSED] ORDER TO
TRANSFER VENUE TO THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS PURSUANT TO 28 U.S.C. § 1404(A)**

Plaintiff Enrique Jevons and Defendants Boston Scientific Corporation, Michael F. Mahoney, and Daniel J. Brennan (collectively, “Defendants,” and together with Plaintiff, the “Parties”), by and through their undersigned counsel, hereby stipulate and agree as follows and jointly request that the Court enter the below Order approving this Stipulation:

WHEREAS, on December 4, 2020, Plaintiff filed the above-captioned securities fraud class action (ECF No. 1);

WHEREAS the Parties have conferred and agree that this case should be transferred to the United States District Court for the District of Massachusetts for at least the following reasons:

1. The individual Defendants reside and/or work in Massachusetts, and Boston Scientific Corporation is a Delaware corporation with its corporate headquarters in Marlborough, Massachusetts;
2. the above-captioned action might have been brought in the District of Massachusetts under 28 U.S.C. § 1391(b)(1); and

3. the Parties agree that transferring this case to the District of Massachusetts is in the interest of the convenience of Parties and witnesses. Moreover, transfer to the District of Massachusetts is consistent with the efficient use of judicial resources, as the District of Massachusetts has a lower caseload per judgeship than the Eastern District of New York (as of September 30, 2020, the Eastern District of New York had a caseload of approximately 800 cases per judgeship, while the District of Massachusetts had a caseload of approximately 370 cases per judgeship). *See* Federal Court Management Statistics -- Profiles (Sept. 30, 2020), *available at* https://www.uscourts.gov/sites/default/files/data_tables/fcms_na_distprofile0930.2020.pdf.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, and respectfully requested, by and among the undersigned counsel for the respective Parties, subject to approval of the Court, that pursuant to 28 U.S.C. § 1404, the above-captioned matter be transferred to the District of Massachusetts.

Dated: New York, New York
December 14, 2020

/s/ Jeremy A. Lieberman

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*Counsel for Defendants
Boston Scientific Corporation,
Michael F. Mahoney, and
Daniel J. Brennan*

IT IS SO ORDERED.

Dated: _____, 2020

ANN M. DONNELLY
UNITED STATES DISTRICT JUDGE